

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

CHAMBERS OF
ROBERT B. KUGLER
UNITED STATES DISTRICT JUDGE

MITCHELL H. COHEN U.S. COURTHOUSE
1 JOHN F. GERRY PLAZA, ROOM 6040
CAMDEN, NJ 08101
856.757.5019

Via ECF

19 February 2020

J. Alex Watkins, Esq.
Capitelli & Wicker
1100 Polydras Street, Suite 2950
New Orleans, LA 70163

Re:

Valsartan N-Nitrosodimethylamine Products Liability Litigation	Master Case MDL No. 2875
Breaux et al. v. Torrent Pharma, Inc. et al.	Docket No. 19-cv-19151
	Hon. Robert B. Kugler, U.S.D.J.
	Hon. Joel Schneider, U.S.M.J.

Dear Mr. Watkins:

Your motion to dismiss Docket No. 19-cv-19151 (ECF Doc. 3) is procedurally deficient. Please file **EITHER** one of the following two submissions:

1. A stipulation of dismissal under Fed. R. Civ. P. 41(a)(1)(ii), which states:

"Plaintiffs and Defendants hereby stipulate under Fed. R. Civ. P. 41(a)(1)(ii) that this action be dismissed without prejudice as to all claims, causes of action, and parties, with each party to bear its own attorneys' fees and costs.

Dated:

Plaintiffs' Attorneys Firm Name

_____*(Signature)*

Address and Telephone

Attorney for Plaintiff

Defendants' Attorneys Firm Name

_____*(Signature)*

Address and Telephone

Attorney for Defendant

OR

2. File a motion for a court order under Fed. R. Civ. Pr. 41(a) (2).

Very truly yours,

s/ Robert B. Kugler
Robert B. Kugler
United States District Judge